

1 Hal Taylor, Esq.  
2 Of Counsel, Olinsky Law Group  
3 NV Bar No.: 4399  
4 2551 West Lakeridge Shores  
5 Reno, NV 89519  
6 Tel: (775) 825-2223  
7 Fax: (775) 329-1113  
8 Email: HalTaylorLawyer@gbis.com

9 Attorney for Plaintiff

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DONALD AMBROSE MOODY, )  
Plaintiff, ) CASE NO. 2:21-cv-01057-VCF  
v. )  
KILOLO KIJAKAZI<sup>1</sup>, )  
COMMISSIONER OF SOCIAL SECURITY, )  
Defendant. )

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Plaintiff, Donald Ambrose Moody, by his attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a forty-five (45) extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed November 15, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. Wherefore, Plaintiff requests an extension from December 30, 2021 up to and including

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<sup>1</sup> Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 January 29, 2022 to file her brief. Counsel for the Plaintiff has conferred with Defendant's  
2 Counsel who kindly consents to this request.

3 Dated this 8<sup>th</sup> day of November, 2021.  
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5 Respectfully submitted,  
6

7 */s/Hal Taylor*  
8 Hal Taylor, Esq.  
9 Of Counsel, Olinsky Law Group  
10 NV Bar No.: 4399  
11 2551 W. Lakeridge Shores  
12 Reno, NV 89519  
13 Tel: (775) 825-2223  
14 Fax: (775) 329-1113  
15 HalTaylorLawyer@GBIS.com

16 **Plaintiff's Certificate of Service:**  
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18 I certify that I caused the Motion for Extension of Time to be served today, November 8,  
19 2021, by CMECF to Christopher Chiou and Daniel P. Talbert, who are the filing users of the  
20 CM/ECF system.  
21

22 */s/Hal Taylor*  
23 Hal Taylor, Esq.  
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25 IT IS SO ORDERED.  
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27   
28 Cam Ferenbach  
United States Magistrate Judge  
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30 DATED 11-15-2021  
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